UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

XPO LOGISTICS, INC.,) Civil No. 3:19-cv-00348-FDW-DSC
Plaintiff,)
)
V.) CLIDDI EMENTEAL
) SUPPLEMENTAL
JESSICA NORTHROP,) DECLARATION OF JESSICA
) NORTHROP
Defendant.)
)
)
)
)

Jessica Northrop hereby declares as follows:

- 1. I am over 18 years of age and of sound mind.
- 2. I am the Defendant in the above captioned matter. The facts stated herein are from my own personal knowledge.
- 3. In addition to "Less-than-truckload," (also known as "LTL,") XPO's businesses also include "drayage," "expedite," "full truckload," "global forwarding," "intermodal," "last mile," "managed transportation," "supply chain" and "technology." XPO's Internet website, www.xpo.com, makes information available to the public regarding each of these businesses. Attached hereto as Exhibits 1 10 are true and accurate printouts from XPO's website describing each XPO business.
- 4. During my tenure with XPO, I have only worked in XPO's LTL business. The only job duties I have performed are those associated with an XPO LTL terminal manager. The XPO LTL terminal in Syracuse, New York, where I previously worked, also employed

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drivers and dock workers. Drivers are responsible for driving XPO's LTL trucks and

transporting LTL loads. Dock workers are responsible for loading and unloading LTL

trucks. I have never performed the job duties of an XPO LTL driver or XPO LTL dock

worker.

5. I have not done any work or performed any job duties for XPO's "drayage," "expedite,"

"full truckload," "global forwarding," "intermodal," "last mile," "managed transportation,"

"supply chain" or "technology" businesses.

I, Jessica Northrop, declare under the penalty of perjury that the foregoing statements are

true and accurate.

Date Signed:___

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Dated: July 31, 2019

/s/ Philip J. Gibbons, Jr

Philip J. Gibbons, Jr., NCSB# 50276 phil@gibbonsleis.com Craig L. Leis, NCSB #48582 craig@gibbonsleis.com GIBBONS LEIS, PLLC 14045 Ballantyne Corporate Pl., Suite 325 Charlotte, NC 28277 Telephone: (704)-612-0038

Attorneys for Defendant

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CERTIFICATE OF SERVICE

This is to certify that on July 31, 2019, the undersigned counsel filed the foregoing pleading using the Court's CM/ECF system that will send notification of this filing to all counsel of record.

/s/ Philip J. Gibbons, Jr Philip J. Gibbons, Jr., NCSB# 50276 phil@gibbonsleis.com

Attorney for Plaintiff